

DEFENSE SUBPOENA

(Criminal Rule 17)

RECEIVED FOR FILING
05/24/2019 12:34:00
NAILAH K. BYRD, CLERK

THE STATE OF OHIO

Cuyahoga County

PRECIPE

DS 1284991

Case Number: CR-19- 636461 -A

To the Sheriff of Cuyahoga County:
 You are hereby commanded to summon:
CUYAHOGA COUNTY LAW DEPARTMENT
2079 E. 9TH STREET
CLEVELAND, OH 44115-0000

JUDGE: PATRICIA COSGROVE
 ROOM: CH3B

IN LIEU OF APPEARANCE, PLEASE PROVIDE THE MATERIALS IDENTIFIED IN THE ATTACHED DUCES TECUM.
 SEE DIFFERENT ATTACHMENTS** IN SAME SUBPOENA'S**

Please Call Defense Attorney: ROGER M SYNENBERG at (216) 622-2727 BEFORE Appearing

TO THE WITNESS

YOU ARE HEREBY ordered to appear, under penalty of law, before the COURT OF COMMON PLEAS, held at the Courts Tower - Justice Center, Lakeside and Ontario Streets, in the City of Cleveland, within and for said County, on the 25th day of June, 2019, at 01:00 o'clock P.M., to testify to all and singular such matters and things which you may know in a certain action in court pending, and then and there to be determined, between the STATE OF OHIO, plaintiff, and EMILY MCNEELEY (defendant 14506372), on the part of the DEFENSE.



WITNESS, NAILAH K. BYRD, Clerk Court of Common Pleas and the seal of said Court, as Cleveland, Ohio, this 29th day of May, A.D. 2019.

NAILAH K. BYRD, Clerk

by

Nailah K. Byrd

WITNESS CERTIFICATION

DATE	TIME	
	IN	OUT

The within named witness has been discharged and did appear on the following dates:

Before leaving the Courtroom, make sure the Prosecutor and/or Judge or Bailiff certifies the below form in order to correctly process your witness voucher. Take this completed certification to the Clerk's office - SECOND LEVEL.

PROSECUTOR, DEFENSE ATTORNEY AND/OR BAILIFF _____

DEPUTY CLERK _____ FILE DATE: _____

TO THE WITNESS: BRING THIS COPY OF THE SUBPOENA AND I.D. WITH YOU.

NOTICE TO VICTIMS OF CRIME

If you are a Victim of a Violent Crime and have been injured, you may qualify for compensation under the Ohio Victims Of Crime Program. Call 1-800-824-8263 for further information or contact the Cuyahoga County Witness Victim Program at 443-7399.

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WITNESS, NAILAH K. BYRD, Clerk Court of Common
 Pleas, and the seal of said Court, as Cleveland, Ohio, this
 29th day of May, A.D. 2019.

NAILAH K. BYRD, Clerk

by _____ Nailah K. Byrd _____

FOR SHERIFF'S USE ONLY

RETURN OF SUBPOENA:

On _____, I _____ served the within named for him, them, at their usual place of business or residence, a true and certified copy thereof with all endorsements therein.

SHERIFF FEES			
Service and Returns	\$		
Miles Traveled	\$		CUYAHOGA COUNTY SHERIFF DEPT., Sheriff
Total	\$		
			Deputy Sheriff



Common Pleas Court of Cuyahoga County, Ohio

Nailah K. Byrd, Clerk of Courts



Defense Subpoena Criminal Rule 17 Worksheet

Case information:Defendant: Emily McNeelyCase number: CR-19-636461-AJudge: Patricia CosgroveCourtroom: To be determinedAttorney/Pro Se Party: Roger M. SynenbergBar number: 0032517Phone: 216-622-2727To summon:First name: Cuyahoga County Law Department

Last name: _____

Address #1: 2079 E 9th St

Address #2 (optional): _____

City/State/Zip: Cleveland, Ohio 44115 Attorney Service Sheriff Service Process Server OtherTo the witness:

In lieu of appearance, please provide the materials identified in the attached Duces Tecum.

Appearance:Date: 6/25/2019Time: 1:00 P.M.Forthwith: Yes No

In lieu of E-Filing, this form is provided as a courtesy to allow the Clerk's staff to input information to generate a subpoena. This form is not meant for service. Please deliver the completed form to the 2nd floor Justice Center Cuyahoga County Clerk of Courts, Criminal Division.

Per Ohio Criminal Rules of Procedure 17(D): A subpoena may be served by a sheriff, bailiff, coroner, clerk of court, constable, marshal, or a deputy of any, by a municipal or township policeman, by an attorney at law or by any person designated by order of the court who is not a party and is not less than eighteen years of age. Service of a subpoena upon a person named therein shall be made by delivering a copy thereof to such person or by reading it to him in person or by leaving it at his usual place of residence, and by tendering to him upon demand the fees for one day's attendance and the mileage allowed by law. The person serving the subpoena shall file a return thereof with the clerk. If the witness being subpoenaed resides outside the county in which the court is located, the fees for one day's attendance and mileage shall be tendered without demand. The return may be forwarded through the postal service, or otherwise.

Duces Tecum to Cuyahoga County

Provide the entire personnel files (excluding any social security numbers or HIPAA information), including, but not limited to, all start and end dates, titles, grievances filed by or against, discipline, salary information including raises, manager names, resignation letters, complaints (formal and informal), exit interview/notes/summaries, and performance reviews, for the following Cuyahoga County employees:

- a. Hitachi Alexander
- b. Matt Bender
- c. Dan Brady
- d. Armond Budish
- e. Ted Carter
- f. Sarah Cammock
- g. Mark Cutright
- h. Debbie Davtovich
- i. Mike DiMarino
- j. Douglas Dykes
- k. Michael Gallagher
- l. Jeanelle Green
- m. David Greenspan
- n. Mark Griffin
- o. Sybil Haney
- p. James Hay
- q. Valissa Howard
- r. Maggie Keenan
- s. Dennis Kennedy
- t. Lenora Lockett
- u. Majeed Makhlof
- v. Trevor McAleer
- w. Emily McNeely
- x. Ken Mills
- y. Jeremy Mio
- z. Daro Mott
- aa. Jeff Mowry
- bb. Joe Nanni
- cc. Cindy Nappi
- dd. Andrea Nelson-Moore
- ee. Rich Opre
- ff. Eric Paliwoda
- gg. Ralph Persram
- hh. Heather Reffett
- ii. Andria Richardson

jj. Scot Rourke
kk. Katie Schaefer
ll. Jeanne Schmotzer
mm. Sharon Sobol-Jordan,
nn. Kelly Spring
oo. Dennis Sullivan
pp. Cory Swaisgood
qq. Catherine Tkachyk
rr. Robert Triozzi
ss. Robin Wilson
tt. Eliza Wing
uu. Michael Young

Records may be delivered via fax, e-mail, or mail to the following:

Roger M. Synenberg, Esq.
Clare C. Moran, Esq.
Matthew A. Kurz, Esq.
Synenberg & Associates, LLC
55 Public Square, Ste. 1331
Cleveland, Ohio 44113
Fax: 216-622-2707
Email: rsynenberg@aol.com; cmoran@synenberg.com; mkurz@synenberg.com

If you have any questions, please contact Roger Synenberg, Clare Moran or Matthew Kurz at 216-622-2727.